

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, *et al.*

Plaintiffs,

v.

RANKIN COUNTY, MISSISSIPPI, *et al.*,

Defendants.

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**Civil Action No.
3:23-cv-374-DPJ-ASH**

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO RANKIN COUNTY, MISSISSIPPI**

To: Rankin County, Mississippi
c/o Jason Dare
Attorney for Defendant Rankin County

The plaintiffs, by and through counsel, pursuant to F.R.C.P. 34, request that the above named defendant serve answers to the following interrogatories within thirty (30) days on

GENERAL GUIDELINES

A. As used herein, the term "defendant" means the Rankin County, Mississippi, its employees, agents, agencies, servants, representatives, consultants, investigators and, if not privileged, its attorneys.

B. As used herein, the term "document" or "documents" means the original or drafts of any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, and all copies thereof which are different in any way from the original (whether by interlineation, receipt stamps, notation, indication of copy sent

or received, or otherwise), regardless of whether designated "confidential," "privileged" or otherwise, and including without limitation, any paper, book, account, photograph, blueprint, drawing, agreement, contract, calendars or diaries, memorandum, advertising material, letter, telegram, object, report, record, transcript, study, note, notation, working paper, intra-office communication, chart, minute, index sheet, computer software, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced, which defendant has or has had access to or of which defendant has knowledge.

C. "You" or "your" or "its" shall mean Rankin County, Mississippi and all those mentioned in Paragraph "A" above.

DOCUMENTS REQUESTED OF RANKIN COUNTY, MISSISSIPPI

1. Please produce all documents identified in response to any of plaintiffs' interrogatories.
2. Please produce all documents in your possession which refer to either of the plaintiffs in any way.
3. Please produce all documents in your possession which refer to any of the incidents and/ or arrests involving:

Joey Gerhart and Brett Gerhart
101 Doug May Road
Mendenhall MS 39114

Samuel Carter
2595 Shiloh Road
Pelahatchie, MS 39145

Alan Schmidt
240 St. Paul Street
Pearl, MS 39208

Rick Loveday
3365 Highway 61 South, Lot 13
Vicksburg, MS 39180

Christopher Holloway
6227 Highway 13 North
Lena, MS 39094

Maurice Porter
Lee County Work Center
301 N. Front Street
Tupelo Mississippi 38804

Catherine Porter
42 Annie Burch Drive
Braxton Miss 39044

Barry Yawn
Central Miss Corrections
3794 MS Hwy 468
Pearl, MS 39208

Jacobi Hopkins
Rankin County Jail
221 N Timber St.
Brandon, MS 39042

4. Please produce all taser logs for the defendant officers in this lawsuit from the year 2018 through the time of their termination.

5. Please produce all documents, reports, tapes, photographs, plats, diagrams, video or audio recordings, tapes, photographs and motion pictures which relate in any respect to either plaintiff.

6. Please produce any and all taser logs which relate in any way to any individual identified in Request 3 above.

7. Produce each and every document which verifies, discusses, reports or refers in any way to the training which each defendant officer received from the Rankin County Sheriff's Department.

8. Please produce all documents, reports, tapes, photographs, plats, diagrams recordings, photographs and motion pictures which relate in any respect to any of the incident complained of in plaintiffs' complaint.

9. Please produce each and every document detailing the responsibilities of Sheriff Bryan Bailey insofar as the operations of the Rankin County Sheriff's Department is concerned.

10. Please produce all documents, reports, tapes, photographs, plats, diagrams recordings, photographs and/or motion pictures which relate in any way to meetings, discussions, forums, or any other communications wherein Sheriff Bailey discussed the operations of the Rankin County Sheriff's Department with Rankin County lawmakers and/or their staffs.

11. Please provide each and every document wherein oversight of the Rankin County Sheriff's Department by County officials is detailed, mentioned or discussed in any way.

12. Please produce any and all documents detailing the steps taken to assure that the operations of the Rankin County Sheriff's Department complied with constitutional requirements.

13. Produce any and all documents wherein Sheriff Bailey provided assurances to you that he had systems, and/or procedures in place indicating that the Rankin County Sheriff's Department was complying with Mississippi Law and the U.S. Constitution in carrying out law enforcement activities in Rankin County.

Submitted by:

/s/ Malik Z. Shabazz
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D.C. Bar #18558

/S/ TRENT WALKER ESQ /S/

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39206

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(Mississippi Local Counsel)

(601) 321-9540

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26TH day of September, 2024, I have electronically transmitted discovery these Request for Production of Document requests to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.